

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

NATIONAL COUNCIL FOR ADOPTION,
BUILDING ARIZONA FAMILIES on behalf
of itself and its birth-parent clients, birth
parents D.V. and N.L., and baby boy T.W. by
and through his guardian ad litem PHILIP
(JAY) MCCARTHY, JR.,

Plaintiffs,

v.

SALLY JEWELL, in her official capacity as
Secretary of the United States Department of the
Interior, KEVIN WASHBURN, in his official
capacity as Assistant Secretary of Indian Affairs,
BUREAU OF INDIAN AFFAIRS, and the
UNITED STATES DEPARTMENT OF THE
INTERIOR,

Defendants.

Civil Action No. 1:15cv00675

DEFENDANTS' MOTION TO TRANSFER VENUE

Pursuant to 28 U.S.C. § 1404(a), Defendants Sally Jewell, Kevin Washburn, the Bureau of Indian Affairs, and the Department of the Interior, by and through their attorneys, hereby move to transfer this action to the United States District Court for the District of Arizona, where this action can be litigated alongside (or even consolidated) with a related case filed in that jurisdiction.

The facts and authority in support of this motion are set forth in the accompanying memorandum of law. Counsel for Defendants consulted with counsel for Plaintiffs on this motion on July 28, 2015 and again on July 30, 2015, and Plaintiffs oppose.

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2015, this DEFENDANTS' MOTION TO TRANSFER VENUE was filed electronically with the Clerk of Court through the Court's CM/ECF system, which will send notification of this filing to the following recipient:

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DATE: July 30, 2015

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